

JULIAN HAMMOND (SBN 268489)  
jhammond@hammondlawpc.com  
POLINA BRANDLER (SBN 269086)  
pblandler@hammondlawpc.com  
ARI CHERNIAK (SBN 290071)  
acherniak@hammondlawpc.com  
HAMMONDLAW, P.C.  
1201 Pacific Ave, 6th Floor  
Tacoma, WA 98402  
(310) 601-6766 (Office)  
(310) 295-2385 (Fax)

*Attorneys for Plaintiff and the Putative Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**JONATHAN HOANG TO; JEFFRY HEISE;**  
and **JOSEPH MULL**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**DIRECTTOU, LLC; and ALLIANCE  
ENTERTAINMENT, LLC**, Delaware Limited  
Liability Companies  
Defendants.

Case No 3:24-CV-06447-WHO

**STIPULATION TO EXTEND  
BRIEFING SCHEDULE ON  
DEFENDANTS' MOTION TO STAY  
AND COMPEL ARBITRATION AND  
CONTINUE HEARING DATES;  
[PROPOSED] ORDER**

1 Pursuant to Civil Local Rule 6-12 and 7-12, Plaintiffs Jonathan Hoang To, Jeffry Heise,  
2 and Joseph Mull (“Plaintiffs”) and Defendants DirectToU, LLC and Alliance Entertainment, LLC  
3 (collectively, “Defendants”) hereby stipulate and request that the Court extend the briefing schedule  
4 on Defendants’ pending Motion to Compel Arbitration, and continue the hearing date on that  
5 Motion and on Plaintiffs’ pending Motion to Appoint Interim Co-Lead Class Counsel, as follows:

6 1. On March 3, 2025, Plaintiffs filed their Motion for Appointment of Interim Co-  
7 Lead Class Counsel. Dkt. 79. On March 10, 2025, the Court re-set the hearing on that Motion to  
8 April 16, 2025. Dkt. 83.

9 2. On March 10, 2025, Defendants filed their Motion to Stay and Compel Arbitration.  
10 Dkt. 80. Pursuant to Civil L.R. 7-3, Plaintiffs’ opposition is due by March 24, 2025; and  
11 Defendants’ reply is due by March 31, 2025. The hearing on that Motion is scheduled for April 16,  
12 2025.

13 3. The parties have conferred and agree that Plaintiffs’ deadline to respond to the  
14 Motion to Stay and Compel Arbitration be extended by 14 days, until April 7, 2025; and  
15 Defendants’ deadline to Reply be extended by 14 days, until April 28, 2025.

16 4. In order to accommodate the extended briefing schedule, the parties also agree that  
17 the hearing on Defendants’ Motion to Stay and Compel Arbitration be continued from April 16,  
18 2025 until June 4, 2025 at 2:00 p.m., the earliest available date on the Court’s motion calendar.

19 5. In order to conserve the resources of the parties and the Court, the parties further  
20 agree that the hearing on Plaintiffs’ Motion for Appointment of Interim Co-Lead Class Counsel be  
21 continued to June 4, 2025, to be heard concurrently with the Motion to Stay and Compel  
22 Arbitration.

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6. These requested extensions will not require changes to any other deadlines in this case.

IT IS SO STIPULATED.

Dated: March 12, 2025

**BAKER & HOSTETLER LLP**

By: /s/ Bonnie DelGobbo  
Bonnie Keane DelGobbo  
*Attorneys for Defendants*

**HAMMONDLAW, P.C.**

By: /s/ Julian Hammond  
Julian Hammond  
*Attorneys for Plaintiff*

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Julian Hammond, hereby certify that I have obtained the concurrence in the filing of the foregoing Stipulation from all other signatories listed above.

**PROPOSED ORDER**

**PURSUANT TO THE STIPULATION, THE COURT ORDERS AS FOLLOWS:**

1. Plaintiffs' deadline to file its opposition to Defendants' Motion to Stay and Compel Arbitration, currently March 24, 2025, is hereby continued until April 7, 2025.

2. Defendants' deadline to file its Reply in support of its Motion to Stay and Compel Arbitration, currently March 31, 2025, is hereby continued until April 28, 2025.

3. The hearing on Defendant's Motion to Stay and Compel Arbitration, currently scheduled for April 16, 2025, is hereby continued until June 4, 2025 at 2:00 p.m.

4. The hearing on Plaintiffs' Motion for Appointment of Interim Co-Lead Class Counsel, also currently scheduled for April 16, 2025, is hereby continued until June 4, 2025 at 2:00 p.m.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE